REMARKS

This Application has been carefully reviewed in light of the Office Action mailed November 1, 2004. In order to advance prosecution of this case, Applicant amends Claims 1, 4, 39, 42, 77, 80, 101, 155, and 161 and cancels Claims 2, 3, 5, 41, 79, and 160 without prejudice or disclaimer. The amendments and cancellations to these claims are not the result of any prior art reference and, thus, do not narrow the scope of any of the claims. Furthermore, the amendments are not related to patentability issues and only further clarify subject matter already present. All of Applicant's amendments have only been done in order to advance prosecution in this case. Additionally, Applicant wishes to note that, with respect to all amendments and cancellations herein, Applicant reserves the right to pursue broader subject matter than that presently claimed through the filing of continuations and/or other related applications. Applicant respectfully requests reconsideration of the pending claims and favorable action in this case.

Section 112 Rejection

The Examiner rejects Claims 1-38, 41-42, 54-55, 77-127, and 155-168 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Applicant has amended Claims 1, 77, 101, and 155 to address the Examiner's concern with respect to Claims 1, 77, 101, and 155.

> With respect to Claims 15-16, 54-55, 107-108, and 134, the Examiner states that:
>
> In Claims 15-16, 54-55, 107-108, and 134, the notion that the first address is compatible with the second address if the first address matched the (part of) second address is indefinite because it is not clear how the object can be delivered if the original address and the destination address are same.
>
> *Office Action*, p. 3.

Applicants respectfully note that the Examiner has improperly read limitations into the language of Claim 15-16, 54-55, 107-108, and 134 and/or the claims from which they depend. The labels "original" and "destination" do not appear in any of these claims. Moreover, Applicant respectfully suggests that the Examiner's reliance on these labels has resulted in a misreading of these claims. For example, amended Claim 1, from which Claim 15 depends, recites *inter alia* "determining in an electronic processing environment if the first address is compatible with the second address" and "at least one of routing an object to the

second point based on the third address and retrieving an object from the second point based on the third address." Neither Claim 1, nor Claim 15, recites delivery to any "original address" or "destination address" as the Examiner suggests.

Thus, Claim 15 is definite as written. The Applicant traverses the Examiner's indefiniteness rejection of Claims 16, 54-55, 107-108, and 134 on similar grounds. Claims 15-16, 54-55, 107-108, and 134 are thus allowable. Applicant respectfully requests reconsideration and allowance of Claims 15-16, 54-55, 107-108, and 134.

The Examiner additionally rejects Claims 3, 41-42, 79-80, and 160-161 on indefiniteness grounds. Applicant respectfully traverses this rejection. Nonetheless, for the purposes of advancing prosecution, Applicant cancels Claims 3, 41, 79, and 160, without prejudice or disclaimer, and amends Claims 42, 80, and 161 to address the Examiner's concerns. Applicant wishes to note that, with respect to all amendments and cancellations herein, Applicant reserves the right to pursue broader subject matter than that presently claimed through the filing of continuations and/or other related applications.

Claim Objection

The Examiner objects to Claim 39, identifying a typographical error in that claim. Applicant amends Claim 39 to address the Examiner's concern, thereby obviating the Examiner's objection.

Section 102 Rejection

The Examiner rejects Claims 1-2, 5-11, 13-14, 17-20, 28-29, 31-32, 36-40, 43-49, 51-53, 56-58, 62, 66-67, 69-70, 74-78, 81-82, 86-94, 97, 100-106, 109, 113, 117-118, 120-121, 125-133, 135-136, 144-145, 147-148, 152-159, and 162-168 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,549,892 issued to Sansone (hereinafter "*Sansone*"). As amended, Claim 1 recites:

> A method for routing an object in a transportation network, comprising:
> storing, in an electronic database, a first address and a first functional property code associated with a first point to be routed;
> storing, in the electronic database, a second functional property code, a second address, and a third address associated with a second point;
> determining in an electronic processing environment if the first address is compatible with the second address;

determining in the electronic processing environment if the first functional property code is compatible with the second functional property code if the first address is compatible with the associated second address;

sending the third address to the first point if the first functional property code is compatible with the second functional property code; and

at least one of routing an object to the second point based on the third address and retrieving an object from the second point based on the third address.

Sansone fails to teach, either expressly or inherently, every element of amended Claim 1. The Examiner cites the entirety of the text associated with Figures 4 and 7 of *Sansone* as reciting every element of Claim 1. Applicant respectfully notes that the Examiner fails to identify the elements of *Sansone* that the Examiner considers to be equivalent to the elements of Claim 1. Applicant also respectfully notes that "[w]hen a reference is complex or shows or describes inventions other than that claimed by the applicant, the particular part relied on must be designated as nearly as practicable." 37 C.F.R. § 1.104(c)(2). Thus, to the extent that the Examiner intends to rely on *Sansone* in rejecting the claims of this Application, Applicant respectfully requests that the Examiner specifically identify the elements of *Sansone* the Examiner believes are equivalent to the elements of Claim 1, or any other rejected claim of this Application, in accordance with 37 C.F.R. § 1.104(c)(2). Nonetheless, *Sansone* fails to disclose, either expressly or inherently, every element of amended Claim 1 for at least several reasons.

First, *Sansone* fails to recite "a first functional property code . . . associated with a first point" or "a second functional property code . . . associated with a second point" as recited by amended Claim 1. *Sansone* generally discloses a method of delivering items that includes "assigning a unique code to each recipient that specifically identifies the recipient, i.e., social security number, tax identification number, etc[.]" Col. 2, ll. 24-26. *Sansone*, however, does not disclose "a first functional property code . . . associated with a first point" or "a second functional property code . . . associated with a second point" as recited by amended Claim 1. Applicant respectfully notes that the Examiner fails to identify what element of *Sansone* the Examiner believes to be equivalent to the first functional property code and the second functional property code of Claim 1. Nonetheless, to the extent that the Examiner may be asserting that the "unique code" of *Sansone* is equivalent to either the first functional property code or the second functional property code, Applicant respectfully notes that the "unique code" of *Sansone* is uniquely assigned to a user. Col. 2, ll. 24-26. The

unique code of *Sansone* is not, however, "associated with a first location" nor is the unique code "associated with a second location[.]" Thus, *Sansone* does not disclose "storing . . . a first functional property code . . . associated with a first point" or "storing . . . a second functional property code . . . associated with a second point" as recited by amended Claim 1.

Second, *Sansone* also fails to recite "determining in an electronic processing environment if the first address is compatible with the second address[.]" Of the cited figures and text, Figure 4 and its associated text describe a process by which "a mailer may obtain a recipient's unique code," while Figure 7 and its associated text describe a process by which "a mail recipient request[s] a routing change for their unique code." Col. 7, ll. 49-51. In particular, the text associated with Figure 4 merely states that a mailer in the system of *Sansone* may provide a name and unique code using a variety of methods and determine a delivery recipient's delivery address based solely on the name and unique code. Col 6, ll. 10-16. Meanwhile, the text associated with Figure 7 discloses only how a mail recipient may "enter[] a request to have the delivery address for their unique code number changed to a different delivery address." Col. 7, ll. 51-54. Nonetheless, as described by *Sansone*, neither of these operations include "determining . . . if [a] first address is compatible with [a] second address." Thus, *Sansone* fails to disclose "determining in an electronic processing environment if [a] first address is compatible with [a] second address" as recited by amended Claim 1.

Third, *Sansone* also fails to disclose "at least one of routing an object to the second point based on the third address and retrieving an object from the second point based on the third address." In rejecting the limitations of this claim element with respect to previously-presented Claims 2 and 5, the Examiner identifies only a "destination address" and a "forwarding address." *Office Action*, pp. 4-5. Applicant respectfully notes that the Examiner fails to identify any "third address." *Sansone* in fact fails to disclose a "third address." Moreover, *Sansone* fails to disclose "at least one of routing an object to the second point based on the third address and retrieving an object from the second point based on the third address" as recited by amended Claim 1.

Thus, *Sansone* fails to teach, either expressly or inherently, every element of amended Claim 1. Claim 1 is thus allowable for at least these reasons. Applicant respectfully requests reconsideration and allowance of Claim 1 and its dependents.

As amended Claim 39 recites:

A system for routing an object in a transportation network, comprising:
a first point operable to obtain and send a first address and a first functional property code associated with the first point to a processor;
the processor coupled to the first point, the processor programmed to:
store, in a database, a second functional property code, a second address, and a third address associated with a second point;
receive the first address and the first functional property code from the first point;
determine if the first address is compatible with the second address;
determine if the first functional property code is compatible with the second functional property code if the first address is compatible with the associated second address; and
send the third address to the first point if the first functional property code is compatible with the second functional property code.

Sansone also fails to teach, either expressly or inherently, every element of amended Claim 39. Applicant respectfully notes that, as with Claim 1, the Examiner, in rejecting Claim 39, cites the entirety of the text associated with Figures 4 and 7 and fails to identify specific elements of *Sansone* that the Examiner considers to be equivalent to the elements of Claim 39. To the extent that the Examiner intends to continue relying on *Sansone* in rejecting the claims of this Application, Applicant respectfully requests that the Examiner specifically identify the elements of *Sansone* the Examiner believes are equivalent to the elements of Claim 39, in accordance with 37 C.F.R. § 1.104(c)(2). Nonetheless, *Sansone* also fails to disclose, either expressly or inherently, every element of amended Claim 39 for at least several reasons.

First, as discussed above with respect to Claim 1, *Sansone* fails to recite "a first functional property code . . . associated with a first point" or "a second functional property code . . . associated with a second point." As noted above, *Sansone* generally discloses a method of delivering items that includes "assigning a unique code to each recipient that specifically identifies the recipient, i.e., social security number, tax identification number, etc[.]" Col. 2, ll. 24-26. *Sansone*, however, does not disclose "a first functional property code . . . associated with a first point" or "a second functional property code . . . associated with a second point" as recited by amended Claim 39. Applicant respectfully notes that the Examiner fails to identify what element of *Sansone* the Examiner believes to be equivalent to the first functional property code and the second functional property code of Claim 39. Nonetheless, to the extent that the Examiner may be asserting that the "unique code" of *Sansone* is equivalent to either the first functional property code or the second functional

property code, Applicant respectfully notes that the "unique code" of *Sansone* is uniquely assigned to a user. Col. 2, ll. 24-26. The unique code of *Sansone* is not, however, "associated with a first location" nor is the unique code "associated with a second location[.]" Thus, *Sansone* does not disclose a processor operable to "store . . . a first functional property code . . . associated with a first point" or to "store . . . a second functional property code . . . associated with a second point" as recited by amended Claim 39.

Second, *Sansone* also fails to disclose a processor operable to "determine if [a] first address is compatible with the second address." Of the cited figures and text, Figure 4 and its associated text describe a process by which "a mailer may obtain a recipient's unique code," while Figure 7 and its associated text describe a process by which "a mail recipient request[s] a routing change for their unique code." Col. 7, ll. 49-51. In particular, the text associated with Figure 4 merely states that a mailer in the system of *Sansone* may provide a name and unique code using a variety of methods and determine a delivery recipient's delivery address based solely on the name and unique code. Col 6, ll. 10-16. Meanwhile, the text associated with Figure 7 discloses only how a mail recipient may "enter[] a request to have the delivery address for their unique code number changed to a different delivery address." Col. 7, ll. 51-54. Nonetheless, as described by *Sansone,* neither of these operations include "determining . . . if [a] first address is compatible with [a] second address." Thus, *Sansone* fails to disclose a processor operable to "determine if [a] first address is compatible with the second address" as recited by amended Claim 39.

Thus, *Sansone* also fails to teach, either expressly or inherently, every element of amended Claim 39. Claim 39 is thus allowable for at least these reasons. Applicant respectfully requests reconsideration and allowance of Claim 39 and its dependents.

As amended, Claim 77 recites:

A method for routing an object in a transportation network, comprising:
obtaining, at a first point, a first address and a first functional property code associated with the first point to be routed;
communicating the first address and the first functional property code;
determining, at a remote location in an electronic processing environment, a second address associated with a second point based on the first address and the first functional property code;
receiving the second address at the first point; and
facilitating routing of an object from a location to a destination based at least on the second address.

Sansone also fails to teach, either expressly or inherently, every element of amended Claim 77. Applicant again respectfully notes that the Examiner fails to identify specific elements of *Sansone* that the Examiner considers to be equivalent to the elements of Claim 77. To the extent that the Examiner intends to continue relying on *Sansone* in rejecting the claims of this Application, Applicant respectfully requests that the Examiner specifically identify the elements of *Sansone* the Examiner believes are equivalent to the elements of Claim 77, in accordance with 37 C.F.R. § 1.104(c)(2). Nonetheless, *Sansone* also fails to disclose, either expressly or inherently, every element of amended Claim 77.

For example, as discussed above with respect to Claims 1, *Sansone* fails to recite "a first functional property code . . . associated with a first point" or "a second functional property code . . . associated with a second point." As noted above, *Sansone* generally discloses a method of delivering items that includes "assigning a unique code to each recipient that specifically identifies the recipient, i.e., social security number, tax identification number, etc[.]" Col. 2, ll. 24-26. *Sansone*, however, does not disclose "a first functional property code . . . associated with a first point" or "a second functional property code . . . associated with a second point" as recited by amended Claim 77. Applicant respectfully notes that the Examiner fails to identify what element of *Sansone* the Examiner believes to be equivalent to the first functional property code and the second functional property code of Claim 77. Nonetheless, to the extent that the Examiner may be asserting that the "unique code" of *Sansone* is equivalent to either the first functional property code or the second functional property code, Applicant respectfully notes that the "unique code" of *Sansone* is uniquely assigned to a user. Col. 2, ll. 24-26. The unique code of *Sansone* is not, however, "associated with a first location" nor is the unique code "associated with a second location[.]" Thus, *Sansone* does not disclose "obtaining . . . a first functional property code associated with the first point to be routed" as recited by amended Claim 77.

Thus, *Sansone* also fails to teach, either expressly or inherently, every element of amended Claim 77. Claim 77 is thus allowable for at least these reasons. Applicant respectfully requests reconsideration and allowance of Claim 77 and its dependents.

As amended, Claim 101 recites:

> A method for routing an object in a transportation network, comprising:
> receiving a first address and a first functional property code associated with a first point to be routed;

storing, in an electronic database, a second functional property code, a second address, and a third address associated with a second point;

determining, in an electronic processing environment, if the first address is compatible with the second address;

determining, in the processing environment, if the first functional property code is compatible with the second functional property code if the first address is compatible with the second address; and

generating the third address if the first functional property code is compatible with the second functional property code.

Sansone also fails to teach, either expressly or inherently, every element of amended Claim 101. Applicant again respectfully notes that the Examiner fails to identify specific elements of *Sansone* that the Examiner considers to be equivalent to the elements of Claim 101. To the extent that the Examiner intends to continue relying on *Sansone* in rejecting the claims of this Application, Applicant respectfully requests that the Examiner specifically identify the elements of *Sansone* the Examiner believes are equivalent to the elements of Claim 101, in accordance with 37 C.F.R. § 1.104(c)(2). Nonetheless, *Sansone* also fails to disclose, either expressly or inherently, every element of amended Claim 101 for at least several reasons.

First, as discussed above with respect to Claim 1, *Sansone* fails to recite "a first functional property code associated with a first point" or "a second functional property code . . . associated with a second point." Applicant respectfully notes that the Examiner fails to identify what element of *Sansone* the Examiner believes to be equivalent to the first functional property code and the second functional property code of Claim 101. Nonetheless, to the extent that the Examiner may be asserting that the "unique code" of *Sansone* is equivalent to either the first functional property code or the second functional property code, Applicant respectfully notes that the "unique code" of *Sansone* is uniquely assigned to a user. Col. 2, ll. 24-26. The unique code of *Sansone* is not, however, "associated with a first location" nor is the unique code "associated with a second location[.]" Thus, *Sansone* does not disclose "receiving . . . a first functional property code associated with a first point to be routed" or "storing, in an electronic database, a second functional property code. . . associated with a second point" as recited by amended Claim 101.

Second, *Sansone* also fails to disclose "determining, in an electronic processing environment, if the first address is compatible with the second address." As discussed above, the cited text merely states that a mailer in the system of *Sansone* may provide a name and unique code using a variety of methods and determine a delivery recipient's delivery address

based solely on the name and unique code and that a mail recipient may "enter[] a request to have the delivery address for their unique code number changed to a different delivery address." Col. 6, ll. 10-16; Col. 7, ll. 51-54. Nonetheless, neither of these operations include "determin[ing] . . . if [a] first address is compatible with [a] second address." Thus, *Sansone* fails to disclose a processor operable to "determining, in an electronic processing environment, if [a] first address is compatible with [a] second address;" as recited by amended Claim 101.

Thus, *Sansone* also fails to teach, either expressly or inherently, every element of amended Claim 101. Claim 101 is thus allowable for at least these reasons. Applicant respectfully requests reconsideration and allowance of Claim 101 and its dependents.

Although of differing scope from Claim 101 and from one another, Claims 128 and 155 include elements that, for reasons substantially similar to those discussed above with respect to Claim 101, are not taught, either expressly or inherently, by *Sansone*. Thus, Claims 128 and 155 are allowable for at least these reasons. Applicant respectfully requests reconsideration and allowance of Claims 128 and 155, and their respective dependents.

Section 103 Rejection

The Examiner rejects Claims 19-22, 30, 33, 59-60, 63, 68-71, 83-85, 95-96, 110-111, 114, 119, 122, 137-138, 146, and 149 under 35 U.S.C. §103(a) as being unpatentable over *Sansone* in view of U.S. Publication No. 2002/0032623 issued to Wheeler et al. (hereinafter "*Wheeler*"). However, this rejection has been effectively disposed of in the context of the §102 analysis tendered immediately above. This is because a proper §103 rejection must be fully supported by references, which when combined, teach, suggest, or disclose all of the claim limitations. (See M.P.E.P. §2142-2143.) Because of the void in the references, which were evaluated extensively herein, the proffered §103 rejection is clearly unsustainable.

Claims 19-22, 30, and 33 depend from Claim 1. Claims 59-60, 63, and 68-71 depend from Claim 39. Claims 83-85 and 95-96 depend from Claim 77. Claims 110-111, 114, 119, and 122 depend from Claim 101. Claims 137-138, 146, and 149 depend from Claim 128. Claims 1, 39, 77, 101, and 128 have all been shown above to be allowable. Claims 19-22, 30, 33, 59-60, 63, 68-71, 83-85, 95-96, 110-111, 114, 119, 122, 137-138, 146, and 149 are thus allowable for at least these reasons. Applicant respectfully requests reconsideration and

allowance of Claims 19-22, 30, 33, 59-60, 63, 68-71, 83-85, 95-96, 110-111, 114, 119, 122, 137-138, 146, and 149.
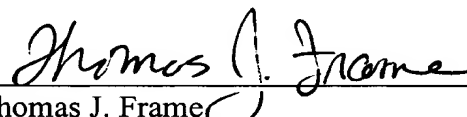
CONCLUSION

Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicant respectfully requests full allowance of all pending Claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicant stands ready to conduct such a conference at the convenience of the Examiner.

Applicant believes no fees are due. If this is not correct, the Commissioner is hereby authorized to charge additional fees or credit any overpayments to Deposit Account No. 02-0384 of Baker & Botts, L.L.P.

If there are matters that can be discussed by telephone to advance prosecution of this application, Applicant invites the Examiner to contact Thomas Frame at 214.953.6675.

Respectfully submitted,
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